

State of Utah)
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County of Millard)

J. F. Holbrook being first duly sworn according to law, deposes and says: That he is the deputy sheriff of Millard County, Utah; that he was present at the examination held at Scipio, Millard Co. Utah the 21st day of Nov. A.D. 1898, by Geo. Crane (Chairman of the Board of Co. Commissioners) for the purpose of examining Susan Agnes Memmott on a charge of insanity; and that he was appointed by said Geo. Crane to make an affidavit of the testimony introduced at said examination.

That the first witness called was Jas. Memmott, that the interrogatories submitted to him and the answers made by him were substantially as follows, to wit:

Q. What relation, if any, do you sustain towards Susan Agnes Memmott?

A. Husband.

Q. Are you the person who subscribed and swore to the affidavit charging Mrs. Memmott with insanity?

A. Yes

Q. When, if ever, did you first notice any mental derangement with your wife?

A. About five years ago.

Q. Did she recover from that attack?

A. Yes, to a great extent.

Q. When, if ever, did you notice any other peculiarity in her actions?

A. About a year or a year and an half ago.

Q. What reason have you for believing that she is insane?

A. She has threatened my life, accused me of attempting to poison her and the children, charged me with attempting to drag her to the wood pile for the purpose of chopping off her head, stated that I had administered poison to the children, and accused me of murdering a number of men and having buried one body in the cellar, and having hanged one person in the kitchen and two in the stable.

Q. How has she treated you in other respects?

- A. She has refused to cohabit with me, or cook for me, and I have had to sleep away from the house for fear of losing my life.
- Q. Have you always provided her with the necessities of life and been kind to her?
- A. Yes.
- Q. How has she treated the children?
- A. She has been mean to two of them.
- Q. How has acted towards other members of the family?
- A. She has accused her mother of stealing things from the place and attempting to kill her.
- Q. Do you think she is a fit subject for custody and treatment at the Asylum?
- A. Yes.
- Q. Did she ever make any attack for purposes of killing you?
- A. Yes, she has tried to strike me with an iron and wagon _____.

That the second witness called was Thomas B. Ivie, who answered the questions submitted to him substantially as follows:

- Q. Where do you reside?
- A. At Scipio.
- Q. How long have you known Mrs. Memmott?
- A. Ever since I was a small boy.
- Q. When, if ever, did you first notice any mental derangement?
- A. Last fall.
- Q. How old are you?
- A. 21 years of age.
- Q. Where was she when you noticed the derangement?

A. At my mother's residence in Scipio.

Q. What did she do at her mother's place to lead you to believe she was insane?

A. She accused my mother of trying to poison her and her children.

Q. Did you notice any other peculiarity of action while she was there?

A. Yes, she called me in to examine papers purporting to be a farewell statement of her husband who was contemplating suicide, but the papers did not relate to that subject.

That the third witness called was Heber Matthews, whose answers to the questions submitted to him were substantially as follows:

Q. How long have you known Mrs. Susan Memmott?

A. Since she was a child.

Q. When, if ever, did you notice any peculiarity in her actions?

A. Last harvest.

Q. What was there peculiar about her actions?

A. She seemed to quarrel with her folks, and looked peculiar.

Q. Did you ever notice any other indication of insanity.

A. Yes, two or three weeks ago she abused her husband.

Q. Do you think she is a fit subject for custody and treatment at the insane asylum?

A. Yes.

Q. Do you think she is a fit subject for custody and treatment at the asylum?

A. Yes.

Q. How does her husband provide for her?

A. Very well.

When the accused, Susan Agnes Memmott, was questioned, she answered substantially as follows:

Q. Are you living with your husband at present?

A. No, because he wants to kill me.

Q. Why do you think he wants to kill you?

A. Because he has tried to poison me and the children, and has administered poison to the children, and he tried to drag me to the wood pile to chop off my head. She stated that he had stamped (?) her while she was pregnant and killed a pair of twins that died shortly after they were born; that he came to her bed one night with a butcher knife, rope, hammer, monkey wrench, and ax, and tried to kill her.

Q. Did he ever try to kill you any other time?

A. Yes. He tried to stick the pitch fork through me _____ when I was sleeping by the window.

Q. Did he ever kill any other person or persons?

A. Yes. He killed me and the children, and we were restored to life, and he hanged a man to the roof in the kitchen, and killed two men in the stable and _____ them _____, and that man he killed in the house ate breakfast with them afterwards and _____ said that looked like the man he had killed.

Q. Did he ever kill any other men?

A. Yes. He killed some men up the creek and I saw their bodies. She stated further that the ghosts of men visited her.

Q. Did the ghost make any statement to you?

A. Yes. He said that his _____ he was wearing then was _____ in his own blood that flowed from his body when he was killed by her husband.

Q. What caused the hole in the ceiling?

A. That was made by my husband so he could hang men there.

Q. How many men has your husband hanged there?

A. I saw one man hanging there, and have smelled the bodied of others at different times.

J. G. Holbrook

Subscribed and sworn to before me this 25th day of November 1898.

James A. Melville
Notary Public